



NORTH DAKOTA DEPARTMENT OF HEALTH
Environmental Health Section

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October 21, 1999

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AIR PROGRAM

OCT 25 1999

Mr. Dick Long, Director
Air and Radiation Program
Mail Code 8P-AR
U.S. Environmental Protection
Agency Region 8
999 18th Street, Suite 500
Denver, CO 80202-2466

Dear Mr. Long:

Minnkota Power Cooperative has submitted a Permit to Construct application to the North Dakota Department of Health (NDDH) for a change in the method of operation at its Milton R. Young generating station located near Center, North Dakota. The application is for a permit revision which would allow Minnkota to operate the two station units at a higher load level than was stated as the maximum design capacity of the units. Air quality modeling analyses have been conducted to determine the impact of the proposed permit revision on ambient air quality standards and PSD (Prevention of Significant Deterioration) increments.

Modeling analyses for permit revision impact on ambient air quality standards and PSD Class II increments were prepared and submitted by Minnkota, and are currently under review by the NDDH. The NDDH conducted its own Class I area analysis, using the Calpuff long-range air quality model. The Class I area analysis revealed significant Milton R. Young contributions to numerous predicted exceedances of Class I increments at Theodore Roosevelt National Park, Lostwood and Medicine Lake (Montana) National Wilderness Areas, and at the redesignated Fort Peck Reservation (Montana). In addition, the analysis revealed the potential for adverse visibility impact at these Class I areas.

The attached draft report describes the Class I area analysis conducted by the NDDH. Minnkota, with the assistance of a consultant (ENSR), is currently reviewing the report. It is our understanding that you have received (or may receive) inquiries from Minnkota regarding assistance on Class I analysis methodology and input conditions provided by the EPA to the NDDH. This copy of the report is being furnished to provide an overview of the methodology employed by the NDDH, and to accommodate the fielding

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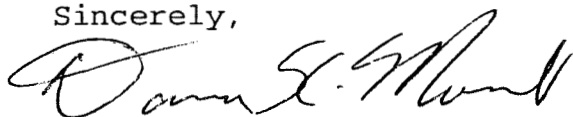
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of questions from Minnkota. In addition, we would appreciate receiving any comments you may have regarding the methodology described in the draft report. A final report will be prepared based on comments received from the EPA Region 8, National Park Service, and Minnkota.

It should be noted that the model emission rates to be used by the NDDH for some nearby sources (Basin Electric Leland Olds Station Units 1 and 2, and Great River Energy's Stanton Station) have not been finalized. Depending on the outcome of the discussions with the companies, the modeled impact on PSD increment consumption by these sources may change.

If you have any questions regarding the NDDH report or modeling analysis, or are interested in computer files referenced in the report, please contact Steve Weber at 701-328-5188.

Sincerely,



Dana K. Mount, P.E.
Director, Division of
Environmental Engineering

DKM/SW:tf
Enc: